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CITY OF LARKSPUR

January 31, 2012

Ezra Rapport
Executive Director
Association of Bay Area Governments
P.O. Box 2050
Oakland, CA 94604-2050

RE: Sustainable Communities Strategy – Comments on Alternative Scenarios

Dear Mr. Rapport:

The City of Larkspur has remained active in the Bay Area Sustainable Communities Strategy process for the last two years. Last year, the City responded to your Initial Vision Growth Scenario on several occasions. Again, the City wants to acknowledge ABAG and MTC staff for their work on the Sustainable Communities Strategy and we continue to recognize it is a difficult task that has to be completed within an exceptionally short time period. Although Larkspur supported the Initial Vision Scenario, increasing the City's household numbers by 341, we identified several reasons that Larkspur would object to any significant increase in housing numbers and/or employment numbers based on numerous constraints to the City due to topographic and the limited amount of available undeveloped land.

We have had an opportunity to review the Alternative Scenarios report and results from December of 2011. We are concerned that in all scenarios, the housing projects have been increased from the IVS projections and in the case of Scenario 2 it has been doubled. Additionally, job projections have been drastically increased, aggressively outpacing local trends. It is notable that there are limited differences between the scenarios, with all resulting in increased housing and job growth numbers. Of the four Alternative Scenarios presented, Scenario 4 (Constrained Core Concentrated Growth) remains the most viable for the City of Larkspur in terms of balancing household growth and Jobs, and Scenario #2 (Core Concentrated) is the most objectionable.

More detailed comments on the scenarios are provided as follows:

Initial Vision Scenario (IVS)

- The data tables provided for the Alternatives continue to present a somewhat skewed set of numbers in terms of the Initial Vision Scenario (IVS), creating potential misconception in relation to the alternatives. The data table continues to present an inaccurate number of 8,036 HH (2010 Household estimate before census) and indicates a -286 reduction in HH units, which results in a swing of almost 1,000 units under various scenarios. The Table does not reflect the 341 household unit increase that was proposed under the Initial Vision

Scenario (IVS) and presents an inaccurate representation of the progression over time of the ABAG alternatives for Larkspur during this SCS process. Please explain the basis for this inconsistency and provide a corrected data set so that a reliable comparison can be presented.

Household Projections

- The City found the household projection of 341 units in the IVS for Larkspur to be reasonable in terms of what is planned for Larkspur and given the physical constraints of the community in terms of its topography and lack of available undeveloped land. The City notes that the RHNA numbers projected 382 units and that is a number that has been accommodated in the City's Housing Element and reflects the constraints noted above. All other Alternative Scenarios result in a substantially higher number of households than planned under our General Plan Policies and current Housing Element. Census 2010 data shows a reduction of 234 households from 2000 to 2010. Although it is anticipated that all scenarios would include household growth somewhat in reverse of this trend, the extent of growth envisioned under these scenarios exceed Larkspur's current General Plan vision for the area and may be unrealistic due to the constraints described below.

Job Growth

- The City of Larkspur concurs with many of the points identified in the letter from Alice Fredrick, Transportation Authority of Marin, dated January 26, 2012, particularly in regard to the aggressive assumptions regarding job growth in Marin. Specific to Larkspur, the scenarios present a range of job growth between 21.2% (1,030) to 30.8% (1,496). The supporting materials and methodology provide no clear indication of what percentage of jobs are expected to be home occupations, expansions of existing businesses, and/or new commercial development. Assuming a conservative estimate of one employee per only 200 square feet of commercial space, the scenarios imply new development of 412,000 to 598,400 square feet of commercial space. The City of Larkspur is largely built-out and has not developed any new commercial space of significance in the last 20 years. This level of development far exceeds what is available for development in Larkspur's jurisdiction along the Hwy 101 corridor and at Larkspur Landing. Our General Plan and vision for the area does not include high-rise densification as contemplated in the San Rafael's downtown and many other PDA's in the Bay Area due to constraints identified below.

Constraints

- The infrastructure around the Hwy 101 Corridor and Transit nodes, whether it is for private and commercial vehicles or public transit, is very limited in most Marin communities by one major road in and out. The currently proposed Highway 101/Greenbrae Interchange project would correct unsafe on and off ramps, but would not increase the infrastructure for moving people in and out of the central portion of the community or to other areas of the region. Essentially, the area within the ½-mile radius of the proposed SMART train station and the existing Ferry Terminal is built out with some, but very limited, potential for the development of additional housing and/or employment beyond what has been built and approved (but not built) for the area.

- Larkspur has a relatively small population and is a largely built-out community with little undeveloped land and few areas that are viable for re-development. The proposed SMART Station is at the end of the line for a train planned as a commuter train from Sonoma County to Marin County and the Larkspur Ferry. There is limited area for infrastructure improvements, and Larkspur has one Hwy 101 interchange and a single regional roadway (Sir Francis Drake Boulevard) that does not lead into the main portion of the City.
- As we have stated repeatedly, any scenarios should take into account the constraints of building within ½ mile of the proposed Larkspur SMART Station location, given the extent of existing build-out and the limited amount of developable land area due to topography, bay water, Corte Madera Creek, and infrastructure constraints (i.e., one major regional roadway that is already congested).
- It is unknown at this time if and when the SMART Station may be built and, again, it is at the end of the commuter line, away from employment centers in San Rafael and Santa Rosa. Many commuters from Larkspur either drive or take the ferry to San Francisco. The projections for those taking the train north are minimal.
- The City notes that the scenarios identify San Quentin (an unincorporated portion of the County) to grow from 1,420 to 1,607 households, a similar range to the IVS. As previously stated, though San Quentin is within the City of Larkspur's sphere-of-influence, those households would only appropriately be allocated to the City if the area were to be annexed and this would be unlikely in a "constrained" scenario where the State prison remains in place. Further, the City notes that the County has additional growth potential within the unincorporated urbanized 101 corridor, which is where the 1,517 household growth should remain. If San Quentin were to be eventually developed as a Transit Hub, the expectation of transit-oriented development would need to be refocused from Larkspur Landing to that location.

In conclusion, Larkspur is very concerned that the increases in household and job numbers in Larkspur may be based upon assumptions regarding the outcome for our Station Area Plan. The City of Larkspur has not applied for a PDA in this location, and the Station Area Plan is still in its initial stages of formation and background preparation. For numerous reasons discussed above, it may well be that the cost of infrastructure, lack of developable land, market forces, sea level rise, and other topographical and environmental constraints to those areas may truly preclude the type of development anticipated under these various ABAG scenarios. Again, our General Plan and vision for the area does not include high-rise densification as contemplated in the San Rafael's downtown and many other PDA's in the Bay Area due to constraints identified below.

On behalf of the Larkspur City Council, thank you for the opportunity to provide input into the process. We remain concerned, however, that the scenarios proposed have increased, in some cases, rather significantly, the household and employment numbers beyond those of the Initial Vision Scenario. We will continue to monitor the SCS process and look forward to reviewing the Draft Preferred Scenario when it is completed. We hope that the ABAG will look towards alternative methods to meeting the SCS goal targets, suggested by TAM and other communities, in a manner that remains consistent with Larkspur's long-term vision for housing and job growth.

Please contact me, or Senior Planner Neal Toft at (415) 927-6713, to discuss adjustments that may be made to the preferred scenario and supporting information.

Sincerely,

A handwritten signature in black ink, appearing to read "Anne Morre", with a long horizontal line extending to the right.

Anne Cronin Morre
Planning Director

C: Ken Kirkey and Jackie Reinhart, ABAG
Larkspur City Council
Dan Schwarz, City Manager